

TOXICITY CHARACTERISTIC

- PROMULGATED MARCH 29, 1990
- REPLACES EP TOX AS A CHARACTERISTIC OF HAZARDOUS WASTE
- USES DILUTE ACIDIC SOLUTION TO EXTRACT A SOLID WASTE (TCLP)
- WASTEWATERS ARE ANALYZED DIRECTLY WITHOUT EXTRACTION

TC CHEMICALS FINAL RULE

- INCLUDES 25 NEW ORGANICS PLUS THE 14 EP MATERIALS
- VCM REGULATORY LEVEL 200 PPB; EDC 500 PPB
- THE TCLP BECOMES THE NEW TEST
- TC WASTES BECOME HAZARDOUS SUBSTANCES UNDER SECTION 101(14) OF CERCLA (RQ ADDED AT 40 CFR 302) & need to be reported

CTL029312

EFFECTIVE DATE

- ALL GENERATORS OF MORE THAN 100 AND LESS THAN 1,000 KG/MONTH MUST COME INTO COMPLIANCE WITH SUBTITLE FOR MANAGEMENT OF THEIR TC WASTES WITHIN ONE YEAR OF PUBLICATION. (3/29/91)
- ALL GENERATORS OF 1,000 KG/MONTH OR MORE MUST COMPLY WITHIN 6 MONTHS OF THE DAY OF PUBLICATION. (9/25/90)

CTL029313

LAND DISPOSAL RESTRICTIONS (LDR)

- TC WASTES NOT IMMEDIATELY SUBJECT TO THE LDR PROGRAM
- NEWLY IDENTIFIED WASTE WILL BE SUBJECT TO A SIX MONTH DEADLINE FOR LDR DETERMINATION WITH NO HAMMER TO TAKE EFFECT.
- OWNER OR OPERATOR OF A NEWLY-REGULATED SURFACE IMPOUNDMENT MUST RETROFIT 4 YEARS FROM THE DATE OF PROMULGATION OF THE ADDITIONAL CHARACTERISTIC.
- WASTEWATER SURFACE IMPOUNDMENTS COULD BE REQUIRED TO RETROFIT SOONER ONCE THE LDR IS PROMULGATED.

list as to what is going on.

only one more

2.0m 3.00 3.10

max height to maximum height

now make the boy & treat first before starting or
and improve restriction even

5/22/95 to make an average improvement from
need to be put in front of the test
(Pat's time to water is 1.5 min)

9/29/95 - 1/2 of water is put in front of the test
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Superficial up in other sites - anything done at
site is done in examination

3/24/95 Montreal

clean up to 200 standards not over

will be adding to this list

CTL029315

TABLE 1 - EP TOXICITY REGULATORY LEVELS

EPA HW Number	CONTAMINANT	REGULATORY Level (mg/l)
D004	Arsenic	5.0
D005	Barium	100.0
D006	Cadmium	1.0
D007	Chromium	5.0
D016	2,4-D	10.0
D012	Endrin	0.02
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2
D014	Methoxychlor	10.0
D010	Selenium	1.0
D011	Silver	5.0
D015	Toxaphene	0.5
D017	2,4,5-TP (Silvex)	1.0

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TABLE 2 - TC REGULATORY LEVELS

EPA HW Number	CONTAMINANT	REGULATORY Level (mg/l)
D004	Arsenic(*)	5.0
D005	Barium(*)	100.0
D018	Benzene	0.5
D006	Cadmium(*)	1.0
D019	Carbon Tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium(*)	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Cresol	200.0
D016	2,4-D(*)	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrin(*)	0.02
D031	Heptachlor	0.008
D032	Hexachlorobenzene	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead(*)	5.0
D013	Lindane(*)	0.4
D009	Mercury(*)	0.2
D014	Methoxychlor(*)	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium(*)	1.0
D011	Silver(*)	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene(*)	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)(*)	1.0
D043	Vinyl chloride	0.2

(*) On the EP Toxicity constituent list

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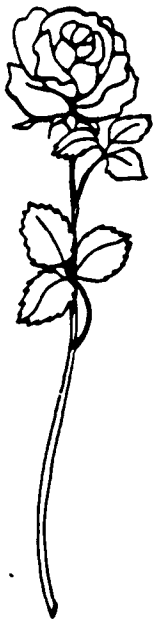
FROM THE DESK OF

Sherry M. Carr

5/21/90

To: Don Kutys:

The attached outline was reviewed at the Vinyl Institute Annual Meeting at a joint meeting of the legal committee and environmental, health and safety committee. They are very concerned about the effects of the new procedure.



Sherry

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